

Exhibit A

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

METROPCS, a brand of T-MOBILE USA,)	
Inc., a Delaware Corporation)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No: 1:15-CV-01062
)	
YOCELYN RAYMOND, a/k/a YOCELYN)	
YULIMAR RAYMOND, a/k/a YOCELYN)	
VILLAPAREDES RAYMOND,)	
)	
Defendants.)	
)	
)	

**NOTICE OF TAKING DEPOSITION DUCES TECUM
OF YOCELYN RAYMOND a/k/a YOCELYN YULIMAR RAYMOND a/k/a YOCELYN
VILLAPAREDES RAYMOND IN AID OF EXECUTION**

PLEASE TAKE NOTICE that Plaintiff MetroPCS, a brand of T-MOBILE USA, Inc., by and through undersigned counsel and pursuant to applicable Federal Rules of Civil Procedure, will take the deposition by oral examination of the following person at the time, date and location indicated below:

Deponent	Date/Time	Location
Yocelyn Raymond a/k/a Yocelyn Yulimar Raymond a/k/a Yocelyn Villaparedes Raymond	July 12, 2016 at 9:00 a.m. (Mountain Time)	Regus Business Centers 221 N Kansas Street Suite 700 El Paso, Texas 79901

The deposition will be taken by stenographic means, before a court reporter or some other officer authorized by law to administer oaths and take depositions. At the deposition, the deponent shall produce the documents listed on **Exhibit A** hereto. The oral examination will

continue from day to day until completed. The deposition is being taken in aid of execution or for such other purposes as the law permits.

By: /s/ Alana Zorrilla-Gaston

April R. Terry

ATTORNEY-IN-CHARGE

Federal Bar No. 24205

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CARLTON FIELDS JORDEN BURT, P.A.

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West Palm Beach, Florida 33401

Phone: (561) 659-7070

Fax: (561) 659-7368

Attorneys for Plaintiff

EXHIBIT A

DEFINITIONS AND INSTRUCTIONS

Except as defined below, all words used in these requests for production shall be construed according to their ordinary accepted meanings, unless some other meaning is clear from the context.

1. “Defendant,” “you” and “your” shall mean and include Yocelyn Raymond a/k/a Yocelyn Yulimar Raymond a/k/a Yocelyn Villaparedes Raymond and each and all of her aliases, assumed identities, past and present companies, agents, employees, heirs, personal representatives, beneficiaries, and all other persons or entities acting or purporting to act for her or on her behalf, including, but not limited to, any corporation, partnership, association, proprietorship or entity of any type that is in any way affiliated or associated with Defendant or one of Defendant’s representatives, agents, assigns, employees, servants, affiliated entities, and any and all persons and entities in active concert and participation with Defendant.

2. “Document” or “documentation” shall mean each and every written, recorded, or graphic matter of any kind, type, nature, or description that is in your possession, custody, or control or of which you have knowledge, including but not limited to correspondence, memoranda, tapes, or handwritten notes, written forms of any kind, charts, drawings, sketches, graphs, plans, articles, specifications, diaries, letters, photographs, minutes, contracts, agreements, reports, surveys, computer printouts, data compilations of any kind, facsimiles, email messages, text messages, spreadsheets, invoices, order forms, checks, drafts, statements, credit memos, reports, summaries, books, ledgers, notebooks, schedules, recordings, catalogs, advertisements, promotional materials, films, video tapes, audio tapes, brochures, or pamphlets, or any written or recorded materials of any other kind, however stored, recorded, produced, or reproduced, and also including, but not limited to, drafts or copies of any of the foregoing that contain any notes, comments, or markings of any kind not found on the original documents or are otherwise not identical to the original documents, as well as any affidavits, statements, summaries, opinions, reports, studies, analyses, computer print-outs, data processing input/output, website screen shots, databases, electronic code, e-mails and all other records kept by electronic means, photographic or mechanical means, and other things similar to any of the foregoing.

3. To “identify” a document means to provide the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. the title or other means of identification of the document;
- b. the date of the document;
- c. the author of the document;
- d. the recipient or recipients of the document;
- e. the subject matter of the document;
- f. the present location of any and all copies of the document; and
- g. the names and current addresses of any and all persons who have possession, custody or control of the document or copies thereof.

4. “Person” means natural persons, individuals, firms, corporations, partnerships, proprietorships, joint ventures, unincorporated associations, government agencies, and all other organizations or entities of any type.

5. To “identify” a person means to state the person’s full name, present or last known address and telephone number, and present or last known business affiliation and title.

6. The phrase “contact or communication” includes all instances in which information has been transmitted from one person or entity to another, including, but not limited to, telephone conversations, meetings, conferences, correspondence, other mailings, facsimiles, email, or other data transmissions of any type or nature, whether oral, electronic, or written.

7. To “identify” a contact or communication means to state the date of the contact or communication, the person or persons involved in, participating in, or present at the contact or communication, and the nature or type of the contact or communication

8. The term “entity” means corporations, companies, businesses, partnerships, proprietorships, or fictitious or trade names.

9. The singular and masculine form of any word shall embrace, and shall be read and applied as embracing, the plural, the feminine, and the neuter.

10. The use of a verb in any tense shall be construed as the use of the verb in all other tenses, wherever necessary to bring within the scope of the request for production all responses which might otherwise be construed to be outside the scope.

11. The term “each” includes the word “every” and “every” includes the word “each.” The term “any” includes the word “all” and “all” includes the word “any.” The terms “and” as well as “or” shall be construed either disjunctively or conjunctively so as to bring within the scope of the request for production responses which might otherwise be construed to be outside the scope.

12. The term “relating to” shall be construed as to include indicating, referring to, mentioning, reflecting, pertaining to, evidencing, involving, describing, discussing, supporting, or contradicting.

13. Each of the requests herein shall be deemed continuing in the manner provided by law.

DOCUMENTS REQUESTED

1. All copies of income tax returns, including amended returns, filed by you, with the federal and state governments, and any and all notices of deficiency or proposed deficiency sent to you by the Internal Revenue Service for the years 2011 to the present.

2. All copies of declarations of estimated income tax filed by you, with the federal and state governments for the years 2011 to the present.

3. All records of all bank checking and/or savings accounts and/or certificates of deposit and/or treasury bills maintained by you, including, but not limited to, monthly bank statements, all canceled checks, all deposit slips, deposit books, and check registers from January 1, 2011 to the present.

4. All records of all bank checking, and/or certificates of deposit, and/or treasury bills maintained by any corporation of which you own all of the stock, and any trust accounts maintained by any corporation of which you own all the stock, including, but not limited to, monthly bank statements, all canceled checks, all deposit slips, deposit books, and check registers from January 1, 2011 to the present.

5. All evidence of property and/or interest in property whose present value or purchase price exceeds \$1,000.00 of every kind and character whatsoever owned by you, including any reversionary interest, and including but not limited to deeds, stock certificates, bonds, notes, evidences of indebtedness, books, records of building, accounts receivable, loan association accounts, savings accounts, and cash.

6. All warranty and quit-claim deeds or deeds to secure debt in which you are named as grantee or grantors relating to any property in which you have any interest or equity or have had any interest or equity from January 1, 2011 to the present.

7. All automobile tag registration certificates naming you as owner or lessee.

8. All stock certificates, bond certificates, mutual fund certificates, or any other evidence of ownership of any interest in any corporation, fund, and/or partnership, naming you as owner or holder.

9. All copies of intangible tax returns filed by you, for the years 2011 to the present.

10. All copies of any personal, financial and/or net worth statements submitted by you to any bank or lending institution from January 1, 2011 to the present.

11. All copies of incorporation, partnership, limited partnership, joint venture, or any other form of business organization agreements (including but not restricted to a professional association or professional corporation) entered into by you from January 1, 2011 to the present.

12. Any and all documents and/or letters received by you from January 1, 2011 and up to the present time from any real estate agent, attorney, accountant, bank officer, stock broker, or any other person whatsoever notifying you of the value of the interest in any corporation, trust, reversionary interest, or in any real or personal property held by you.

13. Any and all documents evidencing your ownership of and the current location of all paintings, drawings, prints, photographs, or similar items described as "works of art" as commonly understood owned by you, in whole or in part, whether possessed by you or held by anyone for your benefit, whose present value or purchase price exceeds \$1,000.00.

14. Any and all documents evidencing your ownership of and the current location of all cameras and photographic equipment, stereos, video recorders, tape recorders, televisions,

and similar electronic appliances and equipment owned by you, in whole or in part, whether possessed by you or held by anyone for your benefit, whose present value or purchase price exceeds \$1,000.00.

15. Any and all documents evidencing your ownership of and the current location of all automobiles, boats, trailers, motor vehicles of any kind and description, motorcycles or scooters, and/or construction equipment owned by you, in whole or in part.

16. Any and all documents evidencing your ownership of and the current location of any other item of personal property, not previously described, owned by you, in whole or in part, having a present value as of the date of this notice of \$1,000.00 or more.

17. Any and all documents identifying your customers.

18. Any and all documents identifying your distributors.

19. Any and all documents identifying any company or person that is, or may be, holding money that is payable to you, or will become payable to you.

20. Copies of all insurance policies and documents evidencing the payment of premiums, any claims made, and the assets/liability covered by each policy.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day a true and correct copy of the foregoing was served by U.S. Mail postage pre-paid upon:

Yoceyln Raymond
11113 Volare Drive
El Paso, TX 79936
Pro se Defendant

Dated: June 13, 2016

CARLTON FIELDS JORDEN BURT, P.A.

/s/Alana Zorrilla-Gaston
Attorney for Plaintiff

RETURN OF SERVICEUNITED STATES DISTRICT COURT
Western District of Texas

Case Number: 1:15-CV-01062

Plaintiff:

METROPCS, a brand of T-MOBILE USA, Inc., a Delaware Corporation,
vs.

Defendant:

YOCELYN RAYMOND, a/k/a YOCELYN YULIMAR RAYMOND, a/k/a YOCELYN
VILLAPAREDES RAYMOND,For: Alana Zorrilla-Gaston, Esq
CARLTON FIELDS JORDEN BURT

Received by SIGNED, SEALED & DELIVERED INC. on the 14th day of June, 2016 at 11:08 am to be served on
YOCELYN RAYMOND, 11113 VOLARE DRIVE, EL PASO, TX 79936. I, Rosa Cervantes, do hereby
affirm that on the 16th day of June, 2016 at 9:35 A.m., executed service by delivering a true copy of
the SUBPOENA DUCES TECUM TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS AND TESTIFY AT A
DEPOSITION IN A CIVIL ACTION in accordance with state statutes in the manner marked below:

☒ INDIVIDUAL SERVICE: Served the within-named person.☐ SUBSTITUTE SERVICE: By serving _____ as
_____.☐ POSTED SERVICE: After attempting service on ____/____ at _____ and on ____/____ at _____ to a conspicuous place
on the property described herein.☐ OTHER SERVICE: As described in the Comments below by serving _____ as
_____.☐ NON SERVICE: For the reason detailed in the Comments below.

MILITARY STATUS: Based on inquiry to person served he or she IS / IS NOT in the United States Military.

COMMENTS: _____

_____Age 30s Sex M F Race African American Height 5'4" Weight 160lbs Hair black Glasses Y (N)

RETURN OF SERVICE For 1:15-CV-01062

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.



Rosa Cervantes
PROCESS SERVER # 1507 EXP:10-31-17
Appointed in accordance with State Statutes

SIGNED, SEALED & DELIVERED INC.
P.O. Box 15255
West Palm Beach, FL 33416
(561) 712-1722

Our Job Serial Number: 2016001157
Ref: 50814-21412